



UNITEDSTATES SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

OMB APPROVAL

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Section FEB 272015

SEC FILE NUMBER

8- 66548

FACING PAGE Washington DC
Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

| REPORT FOR THE PERIOD BEGINNING_                 | 01/01/14<br>MM/DD/YY   | AND ENDING   | MM/DD/YY   |
|--|--|--|--|
| A. REG   | SISTRANT IDENTIFI  | CATION   |  |
| NAME OF BROKER-DEALER: Cobra Tr                  | rading, Inc.   |  | OFFICIAL USE ONLY  |
| ADDRESS OF PRINCIPAL PLACE OF BUS                | INESS: (Do not use P.O. I                                      | Bax No.)   | FIRM I.D. NO.  |
| 4800 Hedgcoxe Road, Suite 300                    | (No. and Street)   | Milliotation to an entry some and the commence of the commence |  |
| Plano  | TX   |  | 75024  |
| (City)   | (State)  |  | (Zip Code)   |
| NAME AND TELEPHONE NUMBER OF PE<br>Chadd Hessing | ERSON TO CONTACT IN  | REGARD TO THIS RE  | PORT<br>972-491-7999<br>(Area Code – Telephone Number  |
| B. ACC   | OUNTANT IDENTIF  | ICATION  | ood aan aan aan ah aa aa aa ah a |
| CF & Co LLP                                      | whose opinion is contained  (Name – if individual, state last, |  |  |
| 015 000 000 000 000                              |  | TX   | 75231  |
| 8750 N. Central Expwy., Ste. 300 (Address)       | Dallas<br>(City)   | (State)  | (Zip Code)   |
| CHECK ONE:                                       |  |  |  |
| Certified Public Accountant                      |  |  |  |
| ☐ Public Accountant                              |  |  |  |
| ☐ Accountant not resident in Uni                 | ted States or any of its pos-                                  | sessions.  |  |
|  | FOR OFFICIAL USE   | DNLY   |  |
|  |  |  |  |

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

SEC 1410 (06-02)

#### OATH OR AFFIRMATION

| Ĭ,                                      | Chadd Hessing   |   |  | , swear (or affirm) that, to the best o           |
|---|---|---|--|---|
| my knowl                                | edge and belief the accompanying financ                             | ial statement and                             | d support                              | ing schedules pertaining to the firm of           |
|   | Cobra Trading, Inc.   |   |  |   |
| of                                      | 12/31   | , 20 <u>_14</u>                               | _, are tru                             | ie and correct. I further swear (or affirm) the   |
| neither th                              | e company nor any partner, proprietor, p                            | rincipal officer (                            | or directo                             | ir has any proprietary interest in any account    |
| classified                              | solely as that of a customer, except as fol                         | llows:  |  |   |
|   |   |   |  |   |
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|   |   |   | Ν.                                     | 11 1  |
|   |   | . destina                                     | - N                                    | Signature   |
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| 1-6                                     |   | 4   |  | Title   |
|   | TIMMEN NORMAN   | €   |  |   |
|   | werro promise   | \ <u>,                                   </u> |  |   |
|   | Notary Public   | <b>WOTAR</b>                                  | YPUR                                   |   |
| This repo                               | rt ** contains (check all applicable boxes                          | ):  | 7                                      | BRITTANY M YEAMANS                                |
|   | acing Page.   |   |  | My Commission Expires                             |
|   | tatement of Financial Condition.                                    |   | 15 18 P                                | August 7, 2016                                    |
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|   | omputation for Determination of Reserve                             |   |  |   |
|   | Reconciliation including appropriate ext                            | danation of the (                             | Computat                               | tion of Net Capital Under Rule 15c3-1 and the     |
|   | omputation for Determination of the Res                             |   |  |   |
|   |   |   |  | Financial Condition with respect to methods       |
|   | onsolidation. N/A   |   |  |   |
| E (1) A                                 | n Oath or Affirmation.  |   |  |   |
|   | copy of the SIPC Supplemental Report,                               |   |  |   |
| $\square$ (n) A                         | report describing any material inadequaci                           | es found to exist                             | or found                               | to have existed since the date of the previous at |

<sup>\*\*</sup>For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).



#### REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors and Stockholder of Cobra Trading, Inc.

We have audited the accompanying statement of financial condition of Cobra Trading, Inc. (the "Company") as of December 31, 2014, and the related statements of income, changes in stockholder's equity, changes in liabilities subordinated to claims of general creditors and cash flows for the year then ended. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Cobra Trading, Inc. as of December 31, 2014, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

The supplementary information contained in Schedules I, II and III (the "Supplemental Information") has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. The computation of net capital and computation of reserve requirements and information relating to possession of control requirements are supplementary information required by Rule 17a-5 under the Securities Exchange Act of 1934. The computation of the minimum capital requirements are supplementary information required by regulations of the Commodity Futures Trading Commission. The NFA supplemental schedule-IB is supplementary information required by the rules of the National Futures Association. The Supplemental Information is the responsibility of the Company's management. Our audit procedures included determining whether the Supplemental Information reconciles to the financial statements or the underlying accounting and other records, as applicable and performing procedures to test the completeness and accuracy of the information presented in the Supplemental Information. In forming our opinion on the Supplemental Information, we evaluated whether the Supplemental Information, including its form and content is presented in conformity with 17 C.F.R. §240.17a-5 and Regulation 1.17 of the Commodity Exchange Act. In our opinion, the Supplemental Information is fairly stated, in all material respects, in relation to the financial statements as a whole.

CF4 Co., L.L.P.

Dallas, Texas February 26, 2015

# COBRA TRADING, INC. Statement of Financial Condition December 31, 2014

#### **ASSETS**

| Cash and cash equivalents Clearing deposit with broker-dealer Receivable from broker-dealer Property, equipment and leasehold improvements, net of accumulated | \$  | 273,978<br>685,040<br>137,144 |
|--|---|-------------------------------|
| depreciation of \$51,590<br>Other Assets   | Marries and State of | 32,625<br>30,716              |
|  | \$  | 1,159,503                     |
| LIABILITIES AND STOCKHOLDER'S EQUITY   |   |                               |
| Liabilities: Accounts payable and accrued expenses   | \$  | 861,938<br>861,938            |
| Stockholder's equity: Common stock, no par value, 100,000 shares authorized, 1,000 shares issued and outstanding Retained earnings                             |   | 96,250<br>201,315             |
| Total stockholder's equity   |   | 297,565                       |
|  | \$  | 1,159,503                     |

# COBRA TRADING, INC. Statement of Income For the Year Ended December 31, 2014

| Revenues:                                      |   |           |
|--|---|-----------|
| Commissions                                    | \$                                      | 2,569,472 |
| Interest income                                |   | 339       |
| Fee income                                     |   | 6,949,095 |
| Miscellaneous income                           | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | 152       |
| Total Income                                   | <u></u>                                 | 9,519,058 |
| Expenses:                                      |   |           |
| Employee compensation and benefits             |   | 1,036,257 |
| Brokerage and clearance fees                   |   | 7,979,318 |
| Communications                                 |   | 35,830    |
| Occupancy and equipment costs                  |   | 65,045    |
| Promotional costs                              |   | 2,234     |
| Interest                                       |   | 348       |
| Regulatory fees and expenses                   |   | 178,520   |
| Other expenses                                 |   | 208,683   |
| Total operating expenses                       |   | 9,506,235 |
| Net income (loss) before income taxes          |   | 12,823    |
| Provision <benefit> for income taxes</benefit> |   | (337)     |
| Net Income                                     | \$                                      | 13,160    |

# COBRA TRADING, INC. Statement of Changes in Stockholder's Equity For the Year Ended December 31, 2014

|                                 | Shares   |    | Common<br>Stock | Retained<br>Earnings | <br>Total     |
|---------------------------------|--|----|-----------------|----------------------|---------------|
| Balance at<br>December 31, 2013 | 1,000  | \$ | 96,250          | \$<br>238,155        | \$<br>334,405 |
| Net income                      |  |    |                 | 13,160               | 13,160        |
| Distributions                   | <b>9-37-11-11-11-11-11-11-11-11-11-11-11-11-11</b> | ,  |                 | <br>(50,000)         | <br>(50,000)  |
| Balance at<br>December 31, 2014 | 1,000  | \$ | 96,250          | \$<br>201,315        | \$<br>297,565 |

# COBRA TRADING, INC. Statement of Changes in Liabilities Subordinated to Claims of General Creditors For the Year Ended December 31, 2014

| Balances at December 31, 2013 | \$<br><del></del> |
|-------------------------------|-------------------|
| Increases                     | ***               |
| Decreases                     | <br>              |
| Balances at December 31, 2014 | \$<br>            |

# COBRA TRADING, INC. Statement of Cash Flows For the Year Ended December 31, 2014

| Cash Flows from Operating Activities  Net income (loss)  Adjustments to reconcile net income (loss) to net cash provided (used) by operating activities:  Depreciation   | \$       | 13,160<br>5,832                             |
|--|----------|---|
| Change in operating assets and liabilities: Increase in clearing deposit with broker-dealer Decrease in receivable from broker-dealer Increase in other assets Increase in accounts payable and accrued expenses | <b>M</b> | (549,549)<br>272,911<br>(19,142)<br>500,122 |
| Net cash provided (used) by operating activities   |          | 223,334                                     |
| Cash Flows from Investing Activities Purchases of furniture and equipment  |          | (23,148)                                    |
| Net cash provided (used) by investing activities   |          | (23,148)                                    |
| Cash Flows from Financing Activities Distributions  Net cash provided (used) by financing activities   |          | (50,000)<br>(50,000)                        |
| Net increase (decrease) in cash and cash equivalents   |          | 150,186                                     |
| Cash and cash equivalents at beginning of year   |          | 123,792                                     |
| Cash and cash equivalents at end of year   | \$       | 273,978                                     |
| Supplemental disclosures Cash paid for:  |          |   |
| Income taxes   | \$       |   |
| Interest   | \$       | 348   |

## COBRA TRADING, INC. Notes to Financial Statements December 31, 2014

#### Note 1 - Organization and Nature of Business

Cobra Trading, Inc. (the "Company") was organized in June, 2004. The Company became a broker/dealer in securities registered with the Securities and Exchange Commission ("SEC") effective December 17, 2004, and is a member of the Financial Industry Regulatory Authority ("FINRA") and the National Futures Association ("NFA"). The Company operates under the exemption provisions of SEC Rule 15c3-3(k)(2)(ii) which provide that all funds and securities belonging to the Company's customers be handled by a clearing broker-dealer.

The Company's customers are primarily individuals trading securities through the Company's online portal.

#### Cash and Cash Equivalents

The Company treats money market mutual funds and all highly liquid debt instruments with original maturities of three months or less as cash equivalents for purposes of the statement of cash flows.

#### Property and Equipment

Property and equipment are stated at cost. Depreciation on office equipment and furniture is computed using the straight line method over useful lives of three to seven years.

#### **Management Estimates**

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the period. Actual results could differ from those estimates.

#### Revenue Recognition

Commissions are recorded on the trade date basis. Fee income is reflected in the period services are performed.

#### **Advertising Costs**

All nondirect-response advertising costs are expensed as incurred. Advertising costs were \$2,234 for the year ended December 31, 2014.

#### Note 2 - Deposits with and Receivable from Clearing Broker-Dealer

Deposits with clearing broker-dealer include cash required to be maintained at the clearing broker-dealer for clearing and trading activities. Receivable from clearing broker-dealer is comprised of commissions. Such amounts are normally collected between five and thirty-five days after month end.

## COBRA TRADING, INC. Notes to Financial Statements (Continued) December 31, 2014

#### Note 3 - Net Capital Requirements

Pursuant to the net capital provisions of Rule 15c3-1 of the Securities and Exchange Act of 1934, a minimum net capital requirement must be maintained, as defined under such provisions. Net capital and the related net capital ratio may fluctuate on a daily basis.

There were no material inadequacies in the computation of the ratio of aggregate indebtedness to net capital at December 31, 2014 and the procedures followed in making the periodic computations required. At December 31, 2014, the Company had net capital of \$234,224 and net capital requirements of \$57,463. The ratio of aggregate indebtedness to net capital was 3.68 to 1 at December 31, 2014. The Securities and Exchange Commission permits a ration of no greater than 15 to 1.

#### Note 4 - Possession or Control Requirements

The Company does not have any possession or control of customers funds or securities. The Company follows the exceptions of Rule 15c3-3(k)(2)(ii) by promptly transmitting all customer funds and securities to the clearing broker who carries the customer accounts.

#### Note 5 - Federal Income Taxes

The Company, with consent of its stockholder, has elected under the Internal Revenue Code to be an S corporation. In lieu of corporation income taxes, the stockholders of an S corporation are taxed on their proportionate share of the Company's taxable income. Therefore, no provision or liability for federal income taxes has been included in these financial statements.

The Company files income tax returns in the US federal jurisdiction and in various state and local jurisdictions. The Company's federal income tax returns for all tax years ended on or after December 31, 2010, remain subject to examination by the Internal Revenue Service. The Company's state and local income tax returns are subject to examination by the respective state and local authorities over various statutes of limitation, most ranging from three to five years from the date of filing. Any interest or penalties associated with income taxes would be included as a component of income tax expense in the period in which the assessment arises.

#### Note 6 – Commitments and Contingencies

The Company is required to indemnify its clearing broker-dealers if a customer fails to settle a securities transaction, according to its clearing agreement. Management was neither aware, nor had it been notified of any potential indemnification loss at December 31, 2014.

The Company is involved in a dispute with one of its clearing brokers in the amount of approximately \$250,000 which arose at the end of 2014. The Company has not reflected the disputed amount and is vigorously disputing the charge. Management feels that the matter will be resolved with no liability to the Company.

#### Note 7 - Credit Risk

At December 31, 2014, and at various times throughout the year, the Company may have had cash balances in excess of federally insured limits.

## COBRA TRADING, INC. Notes to Financial Statements (Continued) December 31, 2014

#### Note 8 - Property, Equipment and Leasehold Improvements

At December 31, 2014, the Company had the following property, equipment and leasehold improvements:

| Leasehold improvements                   | \$        | 3,590            |
|--|-----------|------------------|
| Computer equipment                       |           | 36,455           |
| Office furniture, fixtures and equipment | taran and | 44,170<br>84,215 |
| Less: accumulated depreciation           |           | 51,590           |
|  | \$        | 32.625           |

Depreciation expense during 2014 was \$5,832 and is included in occupancy and equipment expense.

#### Note 9 - Operating Lease

The Company leases office space under a lease expiring December 31, 2019. The Company's minimum lease commitment under the lease is as follows:

| Year Ending |            |
|-------------|------------|
| December 31 |            |
| 2015        | \$ 46,654  |
| 2016        | 40,302     |
| 2017        | 42,541     |
| 2018        | 42,541     |
| 2019        | 42,541     |
| <del></del> | \$ 214,579 |

The Company incurred rent expense of \$48,906 during 2014 and is included in occupancy and equipment expense.

Supplemental Information Pursuant to Rule 17a-5 of the Securities Exchange Act of 1934, as of December 31, 2014

#### Schedule I

# COBRA TRADING, INC. Computation of Net Capital Under Rule 15c3-1 of the Securities and Exchange Commission As of December 31, 2014

| Computation of Net Capital Total ownership equity qualified for net capital      |              | \$<br>297,565 |
|--|--------------|---------------|
| Deductions and/or charges Non-allowable assets:                                  |              |               |
| Property & Equipment   | \$<br>32,625 |               |
| Other assets   | <br>30,716   | 63,341        |
| Net capital before haircuts on securities positions                              |              | 234,224       |
| Haircuts on securities (computed, where applicable, pursuant to Rule 15c3-1(f)): |              |               |
|  | <br>         | <br>          |
| Net capital  |              | \$<br>234,224 |
| Aggregate Indebtedness   |              |               |
| Items included in statement of financial condition                               |              |               |
| Accounts payable and accrued expenses  |              | \$<br>861,938 |
| Total aggregate indebtedness   |              | \$<br>861,938 |

#### Schedule I (continued)

# COBRA TRADING, INC. Computation of Net Capital Under Rule 15c3-1 of the Securities and Exchange Commission As of December 31, 2014

#### Computation of Basic Net Capital Requirement

| Minimum net capital required (6 2/3% of total aggregate indebtedness)                    | \$  | 57,463  |
|--|-----|---------|
| Minimum dollar net capital requirement of reporting broker or dealer                     | \$  | 5,000   |
| Minimum net capital requirement (greater of two minimum requirement amounts)             | \$  | 57,463  |
| Net capital in excess of minimum required  | \$  | 176,761 |
| Net capital less greater of 10% of aggregate indebtedness or 120% of minimum net capital | \$  | 148,030 |
| Ratio: Aggregate indebtedness to net capital   | 3.6 | 8 to 1  |

#### Reconciliation with Company's Computation

There were no material differences in the computation of net capital under Rule 15c3-1 from the Company's computation.

#### Schedule II

# COBRA TRADING, INC. Computation for Determination of Reserve Requirements Under Rule 15c3-3 of the Securities and Exchange Commission As of December 31, 2014

#### **Exemptive Provisions**

The Company has claimed an exemption from Rule 15c-3-3 under Section (k)(2)(ii), in which all customer transactions are cleared through another broker-dealer on a fully disclosed basis.

Clearing firm: Wedbush Securities; Interactive Brokers



### REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM ON MANAGEMENT'S EXEMPTION REPORT

To the Board of Directors and Stockholder of Cobra Trading, Inc.

We have reviewed management's statements, included in the accompanying exemption report, in which (a) Cobra Trading, Inc. (the "Company") identified the following provisions of 17 C.F.R. § 15c3-3(k) under which the Company claimed an exemption from 17 C.F.R. § 240.15c3-3: (k)(2)(ii) (the "exemption provisions") and (b) the Company stated that the Company met the identified exemption provisions throughout the period from June 1, 2014 to December 31, 2014 without exception. The Company's management is responsible for compliance with the exemption provisions and its statements.

Our review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included inquiries and other required procedures to obtain evidence about the Company's compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

Based on our review, we are not aware of any material modifications that should be made to management's statements referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph (k) (2)(ii) of Rule 15c3-3 under the Securities Exchange Act of 1934.

CF & Co., L.L.P.

CF + Co, CLP

Dallas, Texas February 26, 2015



## EXEMPTION REPORT DECEMBER 31, 2014

Comes now the firm and makes the following statements that we believe are true and accurate to the best of our knowledge and belief:

- 1. The firm is exempt from the provisions of \$240.15c3-3(k)(2)(ii).
- 2. The firm met the identified exemption provisions in §240.15c3-3(k)(2)(ii) from June 1, 2014 to December 31, 2014, without exception.

Chadd Hessing

President

INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON
PROCEDURES RELATED TO AN ENTITY'S SIPC ASSESSMENT RECONCILIATION
DECEMBER 31, 2014



### REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM ON THE SIPC ANNUAL ASSESSMENT

To the Board of Directors and Stockholder of Cobra Trading, Inc.

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934, we have performed the procedures enumerated below with respect to the accompanying Schedule of Assessment and Payments ("Form SIPC-7") to the Securities Investor Protection Corporation ("SIPC") for the year ended December 31, 2014, which were agreed to by Cobra Trading, Inc., the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc. and SIPC, solely to assist you and the other specified parties in evaluating Cobra Trading, Inc.'s compliance with the applicable instructions of the Form SIPC-7. Management is responsible for Cobra Trading, Inc.'s compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards adopted by the Public Company Accounting Oversight Board ("PCAOB"). The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures we performed and our findings are as follows:

- 1. Compared the listed assessment payments in Form SIPC-7 with respective cash disbursements records entries (cash disbursements journal) noting no differences;
- 2. Compared the amounts reported on the audited Form X-17A-5 for the year ended December 31, 2014 with the amounts reported in Form SIPC-7 for the year ended December 31, 2014 noting no differences;
- 3. Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers noting no differences; and
- 4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers supporting the adjustments noting no differences.

We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

CF & Co., L.L.P.

CF4 Co., LLP

Dallas, Texas February 26, 2015

IN REV " 10

# SECURITIES INVESTOR PROTECTION CORPORATION FO. 86x 92185 Washington, D.C. 20093-2185 802-271-2300 General Assessment Reconcilitation

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### DETERMINATION OF "SIPC NET OPERATING REVENUES" AND GENERAL ASSESSMENT

Amounts for the histor portodibeginning 1/1/2014 and ending 12/31/2014

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Eliminate cents stem No. 9-5-10-185 9-519-058 En Total revenue (FOCUS Line 12 Part RA Line 9 Gode 4839) If Total revenues from the securities busifess of a revenues leveled foreign subsidias escare predecessors not included above 12. Net coss from at boing promisestices in securities entering incounts At Not uses than procepal transactions in someobiles, it taken accounts 44. Interest and drivisend expense seducted in determining men 2x 15; Not rese from menanement of or performation in the underwriting of distribution of Securities. .5. Expenses oner tran advertis no orthonor registration less and legal been deducted in determining religious from management of or particulation in understance or distinguism of securities. . To hat loss from escurrist in investment actoures. Tota additions 2c. Dedicurs. To Revenues from the distribution of snares of a registered open and investment company or on t myastment trust, from the sciency sample annualities from the business of megrance from investment applicate services rendered to registered in assistant comparise in transact comparise with the services. accounts, and from transporture in security futures a educate 2. Revenues from commodity transactions. 3. Commissions, Nosif Croketage 318 diear side pard is other 3 PC mambers in connection with 7.992 919 7.979 31B securil as itarsactions is. Remburgements for postage in azimoni on with proxy solicitation. So Net gain from securities in revoluter; accounts. is 100% of commissions and marriago parised from transactions in its perfil cases of deposit and ill Treasury bills, bankers acceptanced or commercial paper that makers nine months or less from Issuance date. To Direct expenses of printing advertising, and regalisees incurred in connection with other revenue nested to the securities business frevenue defined by Sett on 16,698, of the Acti a. Other revenue not related either directly or instructly to the tectroles business. See lostituction Ci. Ced otions in excess of \$106,390 require documental on To and All That 22 and 8 decesses bredie before 22 PARTILL Line "I Rode 4075 p.63 (in 2004 apave but not it excess 239 al total interest and dividens income. -45% or margin interest earned on quaramers secor has accounts (40% of FOCUS, the 5, Ocde 3860 Enter the gregiar of the 1. O'r Tora deductions ty SiPC Net Operating Revenues on Gariare Assessment 7 0025

Supplemental Information Pursuant to Regulation 1.17 of the Commodity Futures Trading Commission

For the Year Ended December 31, 2014

#### Schedule III

## COBRA TRADING, INC. Computation of Net Capital Under Regulation 1.17 of the Commodity Futures Trading Commission As of December 31, 2014

#### COMPUTATION OF ADUSTED NET CAPITAL

| Total ownership equity qualified for net capital                                  |   | \$ 297,565 |
|---|---|------------|
| Deductions and/or charges Non-allowable assets: Property & Equipment Other assets | \$ 32,625<br>30,716                     | 63,341     |
| Net capital before haircuts on securities positions                               |   | 234,224    |
| Haircuts on securities (computed, where applicable, pursuant to Rule 15c3-1(f)):  | *************************************** | **         |
| Adjusted Net capital  |   | 234,224    |
| Net Capital Required  |   | 45,000     |
| Excess Net Capital  |   | \$ 189,224 |

Independent Auditors Report on Internal Control
Required by SEC Rule 17a-5 and
CFTC Regulation 1.16



### REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM ON INTERNAL CONTROL

To the Board of Directors and Stockholder of Cobra Trading, Inc.

In planning and performing our audit of the financial statements and supplemental information of Cobra Trading, Inc. (the "Company"), as of and for the year ended December 31, 2014, in accordance with auditing standards generally accepted in the United States of America, we considered the Company's internal control over financial reporting ("internal control") as a basis for designing our auditing procedures for the purpose of expressing an opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. Accordingly, we do not express an opinion on the effectiveness of the Company's internal control.

Also, as required by Regulation 1.16 of the Commodity Futures Trading Commission ("CFTC"), we have made a study of the practices and procedures followed by the Company, including consideration of control activities for safeguarding firm assets. This study included tests of such practices and procedures that we considered relevant to the objectives stated in Regulation 1.16 in making the periodic computations of minimum financial requirements pursuant to Regulation 1.17.

The management of the Company is responsible for establishing and maintaining internal control and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of controls, and of the practices and procedures referred to in the preceding paragraph, and to assess whether those practices and procedures can be expected to achieve the CFTC's previously mentioned objectives. Two of the objectives of internal control and the practices and procedures are to provide management with reasonable but not absolute assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition, and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in conformity with generally accepted accounting principles. Regulation 1.16(d)(2) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in internal control and the practices and procedures referred to previously, error or fraud may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis.

A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

A material weakness is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the Company's financial statements will not be prevented, or detected and corrected on a timely basis.

Our consideration of internal control was for the limited purpose described in the first and second paragraphs and would not necessarily identify all deficiencies in internal control that might be material weaknesses. We did not identify any deficiencies in internal control and control activities for safeguarding securities and firm assets that we consider to be material weaknesses, as defined above.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the CFTC to be adequate for its purposes in accordance with the Commodity Exchange Act and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures, as described in the second paragraph of this report, were adequate at December 31, 2014, to meet the CFTC's objectives.

This report is intended solely for the information and use of the Company's stockholder, Board of Directors, management, the CFTC, the National Futures Association, Financial Industry Regulatory Authority, and other regulatory agencies that rely on Regulation 1.16 of the CFTC in their regulation of registered brokers and dealers, and is not intended to be and should not be used by anyone other than these specified parties.

CF & Co., LLP.

Dallas, Texas February 26, 2015